

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION**

UNITED STATES OF AMERICA §
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v. § **No. 9:20-CR-33-1**
ROBERT LANCE KUPERMAN §

**NOTICE OF GOVERNMENT'S INTENTION TO OFFER 404(b) EVIDENCE
DURING THE GOVERNMENT'S CASE IN CHIEF**

TO THE HONORABLE JUDGE OF SAID COURT:

Rule 404(b) of the Federal Rules of Evidence provides that ..."Evidence of other crimes, wrongs or acts is not admissible to prove the character of a person in order to show action in conformity therewith. It may, however, be admissible for other purposes, such as proof of motive, opportunity, intent, preparation, plans, knowledge, identity, or absence of mistake or accident...."

The Government anticipates that it will introduce into evidence during its case in chief testimony that the defendant, Robert Lance Kuperman, committed the following crimes, wrongs, or acts on occasions other than those charged in the indictment:

1. Kuperman asked contractor, Frank Burrows, to prepare a fraudulent invoice for work that was related to a house located at 337 Apollo in Livingston, Texas.
2. Kuperman intentionally sprayed or otherwise applied water to the floor of a house in the presence of David Issac.

3. Kuperman intentionally sprayed or otherwise applied water to the floor of the Indian Hills house in the presence of Sandi Karnes.

Respectfully submitted,

NICHOLAS J. GANJEI
ACTING UNITED STATES ATTORNEY

/s/ Tommy L. Coleman

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was delivered to the attorney(s) of record in this case, via the U.S. District Court's ECF system of electronic filing on this 2nd day of March, 2021.

/s/ Tommy L. Coleman

Tommy L. Coleman